

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF  
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-02429-MKV

**Supplemental Declaration of  
Joseph Slaughter (Witness C)**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE. *et al.*,

Defendants.

Case No.1:25-cv-02429-MKV

**Supplemental Declaration of Joseph R. Slaughter**

I, Joseph R. Slaughter, declare as follows:

1. I am an Associate Professor of English and Comparative Literature at Columbia. I am also the Director of the Institute for the Study of Human Rights (“ISHR”) at Columbia. I previously submitted a sealed declaration in this action describing my background. *See* Declaration of Witness C (signed March 31, 2025).

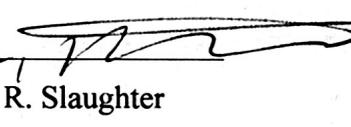
2. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge.

3. I initially filed my declaration in this action under seal, and with some trepidation I now submit it unsealed. I am concerned that simply attesting to the facts contained therein exposes me to potential harassment and retaliation from the administration, the university, or outside actors. However, the very fear of such unwarranted consequences itself testifies clearly to the chilling

effects of the administration's actions. As such, I conclude that it is important to document both the chilling effects and the fear of retaliation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 23 May 2025

Signed:   
Joseph R. Slaughter  
Associate Professor of English  
& Comparative Literature